


1 **BEFORE THE BOARD OF MEDICAL EXAMINERS**  
2 **OF THE STATE OF NEVADA**

3 \* \* \* \* \*

4  
5 **In The Matter of Charges and** ) **Case No. 11-5171-1**  
6 **Complaint Against** )  
7 **PAUL CUMMINGS LUDLOW, M.D.,** )  
8 **Respondent.** )

**FILED**  
**JAN 03 2010**  
**NEVADA STATE BOARD OF**  
**MEDICAL EXAMINERS**  
By: 

10  
11 **COMPLAINT**

12 The Investigative Committee of the Nevada State Board of Medical Examiners, comprised  
13 of Benjamin J. Rodriguez, M.D., Chairman, Beverly A. Neyland, M.D., Member, and Van V.  
14 Heffner, Member, at the time it approved and authorized the filing of this complaint having a  
15 reasonable basis to believe that Paul Cummings Ludlow, M.D., hereinafter referred to as  
16 Respondent, has violated the provisions of NRS Chapter 630, hereby issues its formal Complaint,  
17 stating the Investigative Committee's charges and allegations, as follows:

18 1. Respondent's license is currently in active status (License No. 3496), and has been  
19 so licensed since March 4, 1978 by the Nevada State Board of Medical Examiners pursuant to the  
20 provisions of Chapter 630 of the Nevada Revised Statutes.

21 2. Patient A was a sixty-two year old (62) male at the time of the incidents in question.  
22 His true identity is not disclosed to protect his privacy, but his identity is disclosed in the Patient  
23 Designation served on Respondent along with a copy of this Complaint.

24 3. On or about March 8, 2007, Patient A presented to Respondent with a ten (10) to  
25 fifteen (15) year history of a mass in the right parotid gland. The mass was unchanged in size and  
26 occasionally hard. A CT scan showed the mass to involve the superficial and deep lobes with  
27 extension to the stylomastoid foramen and a question of the mass tracking along the facial nerve.

28 4. Physical examination on March 8, 2007 showed the mass to be 3.5 to 4.0 cm.



1 surgery or its risks, complications or possible alternatives; and, failed to discuss the risks of  
2 severing the facial nerve and/or related complications from this type of surgery with Patient A.

3 14. By reason of the foregoing, Respondent is subject to discipline by the Nevada State  
4 Board of Medical Examiners as provided in Section 630.352 of the Nevada Revised Statutes.

5 **WHEREFORE**, the Investigative Committee prays:

6 1. That the Nevada State Board of Medical Examiners give Respondent notice of the  
7 charges herein against him and give him notice that he may file an answer to the Complaint herein  
8 as set forth in Section 630.339 of the Nevada Revised Statutes within twenty (20) days of service  
9 of the Complaint.

10 2. That the Nevada State Board of Medical Examiners set a time and place for a  
11 formal hearing after holding an Early Case Conference pursuant to NRS §630.339(3);

12 3. That the Nevada State Board of Medical Examiners determine what sanctions it  
13 determines to impose if it determines there has been a violation or violations of the Medical  
14 Practice Act (Nevada Revised Statutes Chapter 630) committed by Respondent; and

15 4. That the Nevada State Board of Medical Examiners make, issue and serve on  
16 Respondent its findings of facts, conclusions of law and order, in writing, that includes the  
17 sanctions imposed; and

18 5. That the Nevada State Board of Medical Examiners take such other and further  
19 action as may be just and proper in these premises.

20 DATED this 31 day of January, 2011.

21 THE NEVADA STATE BOARD OF MEDICAL EXAMINERS

22  
23 By: 

24 \_\_\_\_\_  
25 Bradley O. Van Ry, Esq.  
26 Deputy General Counsel and Attorney for the Investigative  
27 Committee  
28

VERIFICATION

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

STATE OF NEVADA            )  
  : ss.  
COUNTY OF CLARK         )

Benjamin J. Rodriguez, M.D., hereby deposes and states under penalty of perjury under the laws of the state of Nevada that he is the Chairman of the Investigative Committee of the Nevada State Board of Medical Examiners that authorized the foregoing Complaint against the Respondent herein; that he has read the foregoing Complaint; and that based upon information discovered during the course of the investigation into a complaint against Respondent, that he believes the allegations and charges in the foregoing Complaint against Respondent are true, accurate, and correct.

Dated this 3<sup>rd</sup> day of January, 2011.

  
\_\_\_\_\_  
BENJAMIN J. RODRIGUEZ, M.D.


1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**CERTIFICATE OF MAILING**

I hereby certify that I am employed by Nevada State Board of Medical Examiners and that on 3<sup>rd</sup> day of January 2011; I served a file copy of the Complaint, Patient Designation & Fingerprint Information, by mailing via USPS certified return receipt mail to the following:

Paul Ludlow, M.D.  
645 N. Arlington Ave., Ste. 670  
Reno, NV 89503

Dated this 3<sup>rd</sup> day of January 2011.



---

Angelia L. Donohoe  
Legal Assistant